Exhibit 2 Notice of Motion and Opportunity to Object

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN

)
In re) Chapter 9
)
CITY OF DETROIT, MICHIGAN,) Case No. 13-53846
D.1.))
Debtor.) Hon. Steven W. Rhodes
	J

NOTICE OF THE OBJECTORS'
MOTION IN LIMINE TO PRECLUDE DEBTOR
FROM OFFERING EVIDENCE REGARDING THE CITY'S
NEED TO OBTAIN CASINO REVENUES IN CONNECTION
WITH ITS DEBTOR-IN-POSSESSION FINANCING EFFORTS

PLEASE TAKE NOTICE that on September 18, 2013, the Objectors, filed its *Motion* in Limine to Preclude Debtor from Offering Evidence Regarding the City's Need to Obtain Casino Revenues in Connection with Its Debtor-In-Possession Financing Efforts (the "Motion in Limine") in the United States Bankruptcy Court for the Eastern District of Michigan (the "Bankruptcy Court") seeking entry of an order to preclude the introduction of evidence and argument by the debtor, the City of Detroit (the "City"), regarding the need for the City to obtain access to casino revenues in connection with its efforts to secure post-petition debtor-in-possession financing.

PLEASE TAKE FURTHER NOTICE that your rights may be affected by the relief sought in the Motion *in Limine*. You should read these papers carefully and discuss them with your attorney, if you have one. If you do not have an attorney, you may wish to consult one.

PLEASE TAKE FURTHER NOTICE that if you do not want the Bankruptcy Court to grant the Objectors Motion *in Limine*, or you want the Bankruptcy Court to consider your views on the Motion *in Limine*, by **October 3, 2013 at 4:00 p.m. (EDT)** you or your attorney must:¹

Concurrently herewith, the Objectors are seeking expedited consideration and shortened notice of the Motion *in Limine*. If the Court grants such expedited consideration and shortened notice, the Objectors will file and serve notice of the new response deadline. The Motion *in Limine*. If the Court grants such expedited consideration and shortened notice, the Objector will file and serve notice of the new response deadline.

1. File with the court a written response to the Motion *in Limine*, explaining your position explaining your position with the Bankruptcy Court electronically through the Bankruptcy Court's electronic case filing system in accordance with the Local Rules of the Bankruptcy Court or by mailing any objection or response to:²

United States Bankruptcy Court Theodore Levin Courthouse 231 West Lafayette Street Detroit, MI 48226

You must also serve a copy of any objection or response upon:

James H.M. Sprayregen, P.C.
Ryan Blaine Bennett
Stephen C. Hackney
KIRKLAND & ELLIS LLP
300 North LaSalle
Chicago, Illinois 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200

- and -

Stephen M. Gross
David A. Agay
Joshua Gadharf
MCDONALD HOPKINS PLC
39533 Woodward Avenue
Bloomfield Hills, MI 48304
Telephone: (248) 646-5070
Facsimile: (248) 646-5075

2. If an objection or response is timely filed and served, the clerk will schedule a hearing on the Motion *in Limine* and you will be served with a notice of the date, time and location of the hearing.

PLEASE TAKE FURTHER NOTICE that if you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the Motion in Limine and may enter an order granting such relief.

² A response must comply with F. R. Civ. P. 8(b), (c) and (e).

Dated: September 18, 2013

KIRKLAND & ELLIS LLP

By: /s/ Stephen C. Hackney

James H.M. Sprayregen, P.C.

Ryan Blaine Bennett

Stephen C. Hackney

KIRKLAND & ELLIS LLP

300 North LaSalle

Chicago, Illinois 60654

Telephone: (312) 862-2000 Facsimile: (312) 862-2200

- and -

Stephen M. Gross

David A. Agay

Joshua Gadharf

MCDONALD HOPKINS PLC

39533 Woodward Avenue

Bloomfield Hills, MI 48304

Telephone: (248) 646-5070

Facsimile: (248) 646-5075

Attorneys for Syncora Guarantee Inc. and Syncora Capital Assurance Inc.

By: /s/ Vincent J. Marriott, III

Howard S. Sher

JACOB & WEINGARTEN, P.C.

Somerset Place

2301 W. Big Beaver Road, Suite 777

Troy, Michigan 48084

Telephone: (248) 649-1200 Facsimile: (248) 649-2920

E-mail: <u>howard@jacobweingarten.com</u>

-and-

Vincent J. Marriott, III

BALLARD SPAHR LLP

1735 Market Street, 51st Flr. Philadelphia, PA 19103

Phone: 215.864.8236 Fax: 215.864.9762

Email: marriott@ballardspahr.com

-and-

Matthew G. Summers

BALLARD SPAHR LLP

919 North Market Street, 11th Floor Wilmington, Delaware 19801
Telephone: (302) 252-4428

Telephone: (302) 252-4428 Facsimile: (410) 361-8930

E-mail: summersm@ballardspahr.com

Attorneys for Erste Europaische Pfandbriefund Kommunalkreditbank Aktiengesellschaft in Luxemburg S.A.

By: /s/ Karen V. Newbury

Rick L. Frimmer

Karen V. Newbury

Michael W. Ott

SCHIFF HARDIN, LLP

233 S. Wacker Drive, Suite 6600

Chicago, IL 60606

Telephone: (312) 258-5600 Facsimile: (312) 258-5600

E-mail: rfrimmer@schiffhardin.com
E-mail: knewbury@schiffhardin.com

E-mail: mott@schiffhardin.com

Attorneys for DEPFA Bank PLC

By: /s/ Thomas R. Morris

Thomas R. Morris

Karin F. Avery

SILVERMAN & MORRIS, P.L.L.C.

30500 Northwestern Highway, Suite 200

Farmington Hills, Michigan 48334

Telephone: (248) 539-1330 Facsimile: (248) 539-1355

E-mail: <u>morris@silvermanmorris.com</u> E-mail: <u>avery@silvermanmorris.com</u>

-and-

LIPPITT O'KEEFE, PLLC

Brian D. O'Keefe Ryan C. Plecha 370 East Maple Road, 3rd Floor Birmingham, Michigan 48009 Telephone: (248); 646-8292 Facsimile: (248) 646-8375

E-mail: <u>bokeefe@lippittokeefe.com</u> E-mail: <u>rplecha@lippittokeefe.com</u>

Attorneys for Retiree Association Parties

By: /s/Meredith E. Taunt Lynn M. Brimer (P43291) Meredith E. Taunt (P69698) Mallory A. Field (P75289) STROBL & SHARP, P.C.

300 East Long Lake Road, Suite 200 Bloomfield Hills, MI 48304-2376 Telephone: (248) 540-2300

Facsimile: (248) 645-2690 lbrimer@stroblpc.com mtaunt@stroblpc.com mfield@stroblpc.com

Attorneys for Retired Detroit Police Members Association

By: /s/ Caroline Turner English
Carol Connor Cohen
Caroline Turner English
ARENT FOX LLP

1717 K Street, NW

Washington, DC 20036-5342 Telephone: (202) 857-6054

E-mail: Carol.Cohen@arentfox.com

-and-

David L. Dubrow Mark A. Angelov

ARENT FOX LLP

1675 Broadway New York, NY 10019

Telephone: (212) 484-3900

-and-

SCHAFER AND WEINER, PLLC

Daniel J. Weiner (P32010) Brendan G. Best (P66370) 40950 Woodward Ave., Suite 100 Bloomfield Hills, MI 48304

Telephone: (248) 540-3340

E-mail: <u>bbest@schaferandweiner.com</u>

Attorneys for Ambac Assurance Corporation

By: /s/ Guy S. Neal

Eric D. Novetsky

Louis P. Rochkind

JAFFE, RAITT, HEUER & WEISS, P.C.

2777 Franklin Road, Suite 2500

Southfield, MI 48034

Telephone: (248) 351-3000 Facsimile: (248) 351-3082

E-mail: enovetsky@jaffelaw.com

-and-

Jeffrey E. Bjork
SIDLEY AUSTIN LLP

555 West Fifth Street, Suite 4000

Los Angeles, CA 90013 Telephone: (213) 896-6000 Facsimile: (213) 896-6600 E-mail: jbjork@sidley.com

-and-

SIDLEY AUSTIN LLP

Guy S. Neal 1501 K Street, N.W. Washington, DC 20005 Telephone: (202) 736-8000 Facsimile: (202) 736-8711

E-mail: gneal@sidley.com

Attorneys for National Public Finance Guarantee Corporation

By: /s/ Lawrence A. Larose
Lawrence A. Larose, Esq.
Samuel S. Kohn, Esq.
Carrie V. Hardman, Esq.

WINSTON & STRAWN LLP

200 Park Avenue
New York, NY 100166-4193
Telephone: (212) 294-6700
Facsimile: (212) 294-4700
E-mail: llarose@winston.com
E-mail: skohn@winston.com

E-mail: chardman@winston.com

-and-

Sarah T. Foss, Esq.
WINSTON & STRAWN LLP
1111 Louisiana, 25th Floor
Houston, TX 77002-5242

Telephone: (713) 651-2600

Facsimile: (713) 651-2700 E-mail: sfoss@winston.com

Attorneys for Assured Guaranty Municipal Corp.

By: /s/ Mark R. James

Ernest J. Essad Jr. Mark R. James

WILLIAMS, WILLIAMS, RATTNER & PLUNKETT, P.C.

280 North Old Woodward Avenue, Suite 300

Birmingham, MI 48009 Telephone: (248) 642-0333 Facsimile: (248) 642-0856

E-mail: <u>EJEssad@wwrplaw.com</u> E-mail: <u>mrjames@wwrplaw.com</u>

-and-

Alfredo R. Pérez

WEIL, GOTSHAL & MANGES LLP

700 Louisiana Street, Suite 1600

Houston, TX 77002

Telephone: (713) 546-5000 Facsimile: (713) 224-9511

E-mail: Alfredo.perez@weil.com

Attorneys for Financial Guaranty Insurance Company

By: /s/Robert D. Gordon

Robert D. Gordon Shannon L. Deeby CLARK HILL PLC

151 South Old Woodward Avenue, Suite 200

Birmingham, MI 48009 Telephone: (248) 988-5882 Facsimile: (248) 988-2502 E-mail: rgordon@clarkhill.com

Counsel to the Police and Fire Retirement System of the City of Detroit and the General Retirement System of the City of Detroit

By: /s/ Carole Neville
Carole Neville
Claude Montgomery
DENTONS
1221 Avenue of the Americas
New York, New York 10020-1089
D +1 212 768 6700
F +1 212 768 6800
carole.neville@dentons.com
claude.montgomery@dentons.com

Counsel to the Official Committee of Retirees